

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI

In Re:)
MICHAEL & CELESTIA MARTIN,) Case No. 16-48887
Debtors.) Chapter 13 Bankruptcy
)
) Response due: 11/09/2018

DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO DISMISS

COMES NOW Debtors, by and through counsel, and in response to Trustee's Motion state as follows:

1. Debtors admit the allegations in paragraphs 1, 2, 3, 4 and 5 of Trustee's Motion to Dismiss.
2. Further, undersigned counsel is attempting to contact Debtors concerning payments, and respectfully requests a hearing on the Trustee's Motion to Dismiss.

WHEREFORE, having fully answered, Debtors request this Court allow additional time for Attorney to contact Debtors, so that Debtors may become current in their payments, and for such other and further relief as this Court may deem just and equitable.

By: /s/Robert E. Faerber

Robert E. Faerber, MO#46794/ED#60555
Attorney for Debtors
230 S. Bemiston, Ste. 600
Clayton, Missouri 63105
Tel: (314) 727-3434
Fax: (314) 727-6992
Email: faerber@msn.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on October 22, 2018, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Robert E. Faerber